



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

DEC 29 1997

Lewis Bart Stone, Esq.  
New York Republican Federal  
Campaign Committee  
c/o Rogers & Wells, 200 Park Avenue  
New York, NY 10166

Identification Number: C00055582

Reference: 12 Day Pre-General Election Report (7/1/97-10/15/97)

Dear Mr. Stone:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your calculations for Lines 11(a)(iii) and 11(d), Columns A and B appear to be incorrect. Please provide the corrected totals on the Detailed Summary Page.

-You must make an attempt to obtain the full name, mailing address, occupation and name of employer for all individuals who contribute more than \$200 in a calendar year. Please amend your report to include the omitted information.

A committee may demonstrate "best efforts" to obtain the required information by providing the Commission with a description of its procedures for requesting the information and may also supply a copy of a solicitation: the committee must request the contributor information in initial solicitations; make follow-up requests (if necessary); report the information; and file amendments to disclose previously unreported information. Each solicitation must include a clear and conspicuous request

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for the information. If a committee receives a contribution that exceeds the \$200 threshold but lacks contributor information, the committee must, within 30 days, make an additional written or oral request for the information. Please note that a written request may not include an additional solicitation or material on any other subject, other than thanking the contributor for the donation and must include a pre-addressed return post card or envelope for the contributor's response. An oral request must be documented in writing. Committees must also disclose information that was not provided by the contributor, but is available in any of the committee's records for that current election cycle. Furthermore, if a committee receives contributor information after the contributions have been reported, it must submit, with its next report, an amended memo Schedule A listing all the contributions for which additional information was received or file, on or before the next reporting date, amendments to the previous reports on which the contributions were originally disclosed. See 11 CFR §104.3(a)(4)(i) and 11 CFR §104.7.

-Line 12 of the Detailed Summary Page of your report discloses a total of \$388,031 in transfers from affiliated/other party committees. The sum of the entries itemized on Schedule A, however, indicates the total to be \$774,662. Please note, Schedule A for Line 12 includes a page which you may not have intended to file.

-Your report includes computer produced formats of Schedules A, B, H1, H3 and H4. Computer produced formats may only be used upon prior approval of the Commission. You should submit a separate sample format with a cover letter requesting approval. Until your format has been approved, FEC forms must be used. 11 CFR §104.2(d)

-Schedule H3 of your report discloses transfers received from your non-federal account for the "6/10 Golf Outing" fundraising event which occurred outside the permissible transfer period. Please be advised that transfers for shared activity must be made within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor. 11 CFR §§106.5(g)(2) and 106.6(e)(2) Please clarify the nature of these transfers-in from the non-federal account.

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The Commission recommends that you immediately transfer the total excessive amount received by your federal account outside the 70-day time period back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Donald L. Averett  
Senior Reports Analyst  
Reports Analysis Division

